IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA

MACON COUNTY INVESTMENTS, INC. and REACH ONE, TEACH ONE OF AMERICA, INC.,	)	
Plaintiffs,	)	
v.	)	**Civil Action No.: 3:06-cv-224-WKW**
SHERIFF DAVID WARREN, in his official capacity as the SHERIFF OF MACON COUNTY, ALABAMA,	)	
Defendant.	)	

PLAINTIFFS' MOTION TO SHORTEN THE TIME FOR DISCOVERY RESPONSES

COME NOW the Plaintiffs, Macon County Investments, Inc. and Reach One, Teach One of America, Inc. and hereby moves this Court to shorten the time for follow-up discovery responses.

1. On August 15, 2006, the Plaintiffs deposed the Defendant Sheriff David Warren.

2. During the course of the deposition, the Defendant referred to documents which he could produce to the Plaintiffs which would answer or further explain several of the questions relayed to him.

3. Counsel for the Defendant requested that Plaintiffs' Counsel submit a formal Request for Production for the referenced documents.

4. As a result, the Plaintiffs will file an additional Request for the Production of Documents (Exh. 1) as a follow-up to the Defendant's deposition.

5. This Court's June 26, 2006 Order granted the Plaintiffs' Motion for the Commencement of Early Discovery on a limited basis.

6. In that Order, the Court stated that each party may serve a request for documents and that those documents must be produced within three days prior to scheduled depositions.

7. The Order does not provide a time frame for follow-up discovery such as the additional discovery needed from the Defendant.

8. According to the Federal Rules of Civil Procedure, the Defendant would have thirty days to respond to these additional discovery requests. However, the thirty-day time frame would place the parties well past the Court-imposed discovery deadline of August 31, 2006.

WHEREFORE PREMISES CONSIDERED, the Plaintiffs respectfully request that this Court shorten the time allowed for responses to its follow-up discover requests to the Defendant.

Respectfully Submitted,

/s/ Ramadanah M. Salaam-Jones

KENNETH L. THOMAS (THO 043)
RAMADANAH M. SALAAM-JONES (SAL 026)

OF COUNSEL:
THOMAS, MEANS, GILLIS & SEAY
3121 Zelda Court (36106)
P.O. Box 5058
Montgomery, Alabama 36103-5058
(334) 270-1033 (phone)
(334) 260-9396 (fax)

GARY A. GRASSO
ADAM R. BOWERS

OF COUNSEL:
GRASSO DUNLEAVY, P.C.
7020 County Line Road
Suite 100
Burr Ridge, Illinois 60527
(630) 654-4500 (phone)
(630) 355-4646 (fax)

Attorneys for the Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served upon all counsel of record via this Court's electronic filing system on this the 16th day of August, 2006.

Fred D. Gray
Fred D. Gray, Jr.
GRAY, LANGFORD, SAPP,
MCGOWAN, GRAY & NATHANSON
P.O. Box 830239
Tuskegee, Alabama 36083-0239
(334) 727-4830 (phone)
(334) 727-5877 (fax)

/s/ Ramadanah M. Salaam-Jones

OF COUNSEL